

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

NOEMI RAMOS and JUAN BONET, her
husband,

Plaintiff,

v.

WALMART INC., A.B.C. COMPANIES (1-
100) (fictitious entities), JOHN
DOES (1-100) (fictitious names),

Defendants.

Civil Action No.: 2:21-
cv-17068-CCC-AME

MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that Defendant Walmart Inc. ("Walmart") will apply to the above-named Court at Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07102, on **December 18, 2023**, or as soon thereafter as counsel may be heard, for an Order granting Summary Judgment against Plaintiffs and dismissing Plaintiffs' Complaint. Walmart will rely upon the Memorandum of Law submitted herewith and the submitted Statement of Material Facts. Additionally, a proposed form of Order is submitted.

ORAL ARGUMENT

Walmart requests oral argument if this matter is contested.

CERTIFICATION

I certify that the foregoing statements made by me are true.
I am aware that if any of the foregoing statements made by me are
willfully false, I am subject to punishment.

Respectfully submitted,

By:

LANDMAN CORSI BALLAINE & FORD P.C.

/s/ Lauren E. McGovern
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Dated: November 22, 2023